Part 121 Dispatch and Operational Control systems are now in place to help oversee the safety and regulatory compliance of transport catagory aircraft during operations by U.S. air carriers. It is not enough to make the fractional owner(s) responsible for regulatory compliance and subject to surveillance and enforcement action. The operations of these aircraft must be subject to real-time safety monitoring, both in the interests of those aboard the fractionally owned aircraft and the public aboard aircraft being operated in the same airspace or airport facilities.

Such safety information and guidance from a ground-based operational control entity (dispatch center, CFR Part 121)includes but is not limited to:

Evaluation of departure, arrival, en route and alternate airport conditions that promote the safety of flight without the flight crew be forced to make uninformed decisions based on incomplete or outdated information.

Evaluate the operation of the aircraft with systems or components inoperative under certain allowable circumstances with the approriate aircraft performance computations and en route/airport limitation data.

Quickly and efficiently evaluate appropriate diversion airport suitablilty in case of mechanical failure(s) or passenger emergency.
-weather conditions and applicable aircraft performance considerations
-NOTAMS and the operational status of other airport, navaid, crash-Fire-Rescue equipment, and availability of medical facilities.
-Runway conditions and tower operation hours and procedures if closed
-Appropriate availablilty of communications ground handling equipment and fuel for departure
-Computations of aircraft performance data to calculate required runway length for landing and departure performance.

Safety of operation must include appropriate, timely, and continuing evaluation of weather data and forecasts for routing around turbulence, thunderstorms and icing conditions, particularly when adverse conditions are encountered en route and/or as a result of airspace or aircraft limitations that were unknown during the planning stages of a flight.

Appropriate aircraft performance computations to ensure terrain clearance after an engine failure and choosing suitable alternate airports if terrain clearance cannot be maintained (driftdown).

Monitor crew duty times and rest periods for regulatory compliance. Establish and implement procedures to secure aircraft, provide crew rest, and accomodate passsengers when crew fatigue becomes a safety factor based on prudence rather than regulations.

Apply programs to notify government authorities and family members in the event of an aircraft accident.

The great majority of these transport catagory aircraft will be operated by two-pilot crews. In an emergency situation, one pilot is charged with flying the aircraft (likely performance limited to some extent) and the other pilot is charged with communications and gathering correct data about the airplane performance and configuation as well as airspace/airport operational data. Without appropriate real-time ground support, the aircraft becomes a one-pilot operation and continued operation is deteriorated to the extent that it becomes a threat to the air safety.

All of these operational control considerations are SAFETY considerations not just regulatory or compliance issues.

Pilots-In-Command and Aircraft Dispatchers make joint tactical decisions on a daily basis in the U.S. air carrier environment that routinely involve weather, facility, passenger and performance issues. Along the the Air Traffic Control system this "triad of safety" is the best in the world.

I challenge any "program manager" to make a timely and safety-based decision when awakened a 0300 and informed that an turbine aircraft over the rocky mountains has had an engine failure or a passenger has had a heart attack over West Virginia.

Executive Jet, the "founder" firm of fractional ownership has seen fit in the interest of the highest level of safety to institute a dispatch and flight following system. The U. S. Air Force has established the Tanker/Airlift Control Center (TACC) for operational control of transport catagory-size aircraft - all of the Flight Managers are certified Aircraft Dispatchers. It should be noted that the Air Force contracted with a U.S. Flag/Domestic carrier to set up the system.

Instituting the regulations and procedures stipulated in the NRPM is a threat to public safety in the name of economy, simplification and easing of "regulatory burden." Implemention of these proposed standards will amount to placing corporate profits ahead of public safety - it appears that safety, indeed, has a price.